

**Federal Defenders
OF NEW YORK, INC.**

Southern District
52 Duane Street - 10th Floor, New York, NY 10007
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton
Executive Director
and Attorney-in-Chief

Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

MEMO ENDORSE

May 4, 2022

5/4/22

BY ECF

Honorable Colleen McMahon
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

CASE adj to JUNE 14, 2022
At 10:45 - time excluded
through JUNE 14, in the interest
of justice, to facilitate plea
discussions.

Re: United States v. Mario Martinez Beltran,
21 Cr. 473 (CM)

Colleen McMahon

Dear Judge McMahon:

I write with the consent of the government to request adjournment of the conference currently scheduled for May 10 at 2:00 p.m. The parties are in the final stages of plea discussions, but we require additional time for translation, client counseling, and final agreement. This process will be delayed because I will be on trial in another matter beginning on May 17. Accordingly, we request that the appearance be adjourned to June 13 or 14 if the Court has availability on either of those dates.

The government consents to the requested adjournment and seeks the exclusion of time under the Speedy Trial Act. The defense consents to the exclusion of time under 18 U.S.C. § 3161(h)(7).

Respectfully submitted,

/s/

Clay H. Kaminsky
Assistant Federal Defender
(212) 417-8749 / (646) 842-2622

cc: AUSA Danielle Kudla

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 5/4/22